

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMIN YOUSEF

Debtor

CHAPTER 13

**CASE NUMBER: 2:20-bk-
11115**

**MOTION TO EXTEND
TIME OF CLAIMS BAR
DATE (FILE A LATE
CLAIM)**

**CREDITOR'S MOTION TO EXTEND TIME OF CLAIMS BAR DATE
(FILE A LATE CLAIM)**

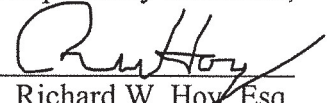
Anwar Albarouki, creditor, by and through undersigned counsel, hereby submits his Motion to Extend Time of Claims Bar Date. In support thereof, Creditor states:

1. Creditor is Anwar Albarouki, an adult Pennsylvania resident with an address of 2434 S. 11th St. Philadelphia, PA 19148.
2. Creditor was listed in Debtor's list of creditors found in Debtor's Chapter 13 Voluntary Bankruptcy Petition, which was filed on February 24, 2020.
3. Currently, there is a Meeting of Creditors scheduled for June 25, 2020 at 9:30 AM.
4. Deadline for filing a Proof of Claim was May 4, 2020.
5. Creditor had filed a civil lawsuit against the Debtor before Debtor filing his Bankruptcy Petition (Philadelphia Court of Common Pleas Docket No. 200103245.)
6. Creditor did not gain knowledge that Debtor entered bankruptcy proceedings until March 11, 2020, which is the date Creditor's counsel became aware of Debtor's bankruptcy proceedings via email from Debtor's attorney's office.
7. Debtor's attorney had knowledge of the Creditor's civil lawsuit against the Debtor and such knowledge should be considered notice as an "informal proof of claim."

8. The civil lawsuit should be considered an “informal proof of claim” because it apprises the court to the existence, nature, amount, and the Creditor’s intention to hold Debtor liable for the claim.
9. Also, Creditor nor Creditor’s attorney received notice of deadlines for filing the Proof of Claim.
10. Due to such insufficient notice, the court should allow the Creditor to file a Proof of Claim and have the Proof of Claim be accepted retroactively.
11. In the event this Motion is granted, the Creditor is only seeking the deadline be extended a short period of time after this Motion is granted.

WHEREFORE, the Creditor respectfully requests that this Court grant his Motion, extend the deadline, and allow Creditor to retroactively file his Proof of Claim.

Respectfully submitted,



Richard W. Hoy, Esq.
Counsel for Creditor